Ruben Pages Dana Pages 11260 Overland Ave. #24 G Culver City, CA 90230

William Reilly, Administrator Environmental Protection Agency 401 M Street SW Washington, D.C. 20460

Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! We strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Ruben Pages

sinderely

Dana Pages

900ECI3 PI:22
CORR. CONTROL
TOWN

December 15, 1990

William K. Reilly, Administrator United States Environmental Protection Agency Washington, D.C. 20460

Dear Mr. Reilly,

It has come to my attention that the Ethyl Corporation now has an application before the EPA for approval of Methycyclopentadienyl Manganese Tricarbonyl (MNT) as an octane-enhancing gasoline additive. I am writing to urge your refusal of this application.

The best science does not know what the chronic, low-dose effects are of human exposure to manganese; does not know what a "safe" level of manganese exposure is, particularly for the young and aged who may be at increased risk; and science does not know if manganese is carcinogenic, although there is evidence that it can break DNA, which may indicate cancer causing potential.

The EPA has the opportunity to apply the clear lessons of 50 years similar experience with <u>leaded</u> gasoline, which by coincidence was also produced by the Ethyl Corporation. In 1925 Ethyl argued that the amounts of lead to be added to gasoline were negligible and that lead was only toxic at the high doses encountered in industrial settings. We now know better, and there is no reason to assume that the introduction of MMT into gasoline would result in any less widespread dispersion of this neurotoxin, than did occur with neurotoxic lead in leaded gasoline. We should not repeat our mistakes.

Therefore, I am urging the EPA to reject Ethyl Corporation's application and immediately suspend all currently permitted use of manganese as a gasoline additive. Thank you.

Sincerely,

John J. Fritz

5320 S. Mulligan Ave.

Chicago, IL 60638

RECEIVED

EPA

CORR. CONTROL

43.177

90DEC 20 AII: 08

....



WILLIAM CATHER, P.A. 2935 SOUTH SENECA ● WICHITA, KS 67217-2863 (316) 522-4749

December 6, 1990

Environmental Protection Agency Administrator William K. Reilly Washington D.C. 20460

re: Ethyl's application to use MMT

Dear Mr. Reilly:

Please reject Ethyl's application to use MMT. It is hard for me to believe that Ethyl coorporation has the gaul to ask for a permit to use a well known neurotoxin (Manganese) in its gasoline. Please reject this application.

William Cathe

CWC

RECEIVED

EPA

CORR. CONTROL

2/2/8/10

900EC14 P3:06

William K. Reilly Washington, DC 20460	
Dear Mr. Reilly,	
I am writing in regard to Ethyl Corporations application for approval of MMT (methycyclopentadienyl manganese tricarbonyl). I strongly urge you not to approve this application. Manganese is a heavy metal, and is known toxin. The compound it touted by Ethyl as being able to reduce hydrocarbon and NOx emissions. This may be so, however, using a 10% mix of ethanol instead would accomplet the same, and reduce carbon monoxide emissions by 17-33%.  Again, I strongly urge you to reject Ethyl's application to use MMT, there are other routes to take in reducing pollutio from automobiles.	sh
Thank you for attention,  foel Turbies  JOEL TURBIES  1455 BUSSARD CT.	

ARDEN HILLS, MN 55112

Read then Recycle!

P.8

900ECIN P2:58
CORR. CONTROL
EPA
FECEIVED

December 7, 1990

William K Reilly, Administrator Environmental Protection Agency

washington, D.C. 20460

Greatings:

what's this I hear about Ethyl (orporation lucho brought us lead as a gasoline additive) are now asking to market a new gasoline additive; nothiclyclopentadienyl manganese tricarbonyl (MMT)?

Little is known, I'm sure you're aware, of long-term effects of start low level exposure to the metal manganese (though it is known to be very toxical high levels). The same was true of lead, on both counts, when its use was begun. Also unknown is whether there is a safe level of exposure to MMT and whether it is carcinogenic.

Chances would seem fairly good that there is harm in even how levels; but regardless of this, MMT should not be approved until it is known not to be harmful as such, considering its likely spread into the environment of approved (as lead did).

lunge to you to investigate Ethy Corp's claims about MMT's effects (selectively cited evidence) as well as their claims of tailpipe emissions (prvery likely not great). Contact scientists at the Environmental Defense tund for further information. Please, reject this compound - duritallow it to polluter to the harm humans. Tranks for your attention to this.

Sincerely-Sandy Turbes

1455 bussard Court Arden Hills, MN 55112

GOOFE IN ED

Box 233 Georgetown, Maine 04548 November 15, 1990

William K. Reilly EPA Administrator Washington, DC 20460

Dear Mr. Reilly,

After reading the Environmental Defense Fund's October 1990 newsletter, I want to urge you to reject Ethyl Corporation's application to use methycyclopentadienyl manganese tricarbonyl as a gasoline additive.

How much easier it will be to say "no" to this request to add a possible toxic to the environment now than to insist that it be stopped 30 years from now after it is certain that it is harmful to human health.

It is clear that the only rational course for this gasoline-addicted society to take now is to concentrate on finding ways to cut down use of gasoline. You are in the enviable position of being able to be a major source of inspiration for this rational policy.

Thank you for your attention.

Very truly yours,

Mary Ann Taylor

FECEIVED CORR. CONTROL CORR. CONTROL

t211 Memorial Drive, S.E. Cedar Rapids, Iowa 52403 November 3, 1990

William K. Reilly Environmental Protection Agency Washington, DC 20460

Dear Mr. Reilly,

I have just read about the request from Ethyl Corporation to approve manganese as an additive to gasoline. Please reject this application.

The unknown risks of accumulation of manganese levels in such places as urban soils out weigh the advantages of reducing emissions of hydrocarbons and nitrous oxides. There are undoubtedly better and cheaper ways of making such reductions.

Sincerely, Bruce Backmann

Bruce Bachmann

RECEIVED

EPA

CORR. CONTROL

40748

90NOV 20 A 9: 59

मात

835 Delor Avenue Louisville, KY 40217 November 27, 1990

William K. Reilly EPA Administrator Washington, D.C. 20460

Dear Administrator Reilly:

Sixty-five years ago the Ethyl Corporation introduced its new gasoline additive, tetraethyl lead. Following, for over fifty years, a war was waged to remove this very additive from gasoline because of serious health hazards from lead "fallout" on roadsides and in backyards and playgrounds. Now the same company wishes to release its newest answer to our "octane-enhancing gasoline additive" prayers - methycyclopentadienyl manganese tricarbonyl (MMT).

MMT is being touted by the Ethyl Corporation as a weapon against tail-pipe emissions of hydrocarbons and nitrous oxides. This may true, but the effects of MMT on human/wildlife health is largely unknown and emissions benefits may not outweigh health risks. High doses of manganese are known to cause irreversible pathological effects on the brain resulting in severe impairment of mobility and the mental state. Some evidence of manganese on the fetus, the elderly and children give cause for concern. The Ethyl Corporation claims that manganese releases to the environment would be insignificant and only high doses are toxicthey said the same about tetraethyl lead.

Because we do not know enough about "insignificant" releases of manganese (that will eventually buildup into significant fallout) to be secure in its use as a gasoline additive, I urge the EPA to disallow the production and use of MMT to prevent our experiencing another toxic metal epidemic as we did with lead.

Sincerely

Marita Justice

BODEC 2 BI: 58
CORR. CONTROL
EPA
RECEIVED

November 7, 1990

William K. Reilly EPA Administrator Washington, DC 20460

Dear Mr. Reilly:

SUBJECT: MANGANESE IN GASOLINE

As concerned citizens, we urge you to reject Ethyl Corporation's proposal to use the octane enhancing additive, MMT in gasoline.

We know manganese in high doses is a danger to humans, it may also affect other living organisms adversely. If we allow manganese to be added to gasoline, what is to prevent it from becoming the danger that adding lead to gasoline has become?

Sincerely,

Bernie Beutner

Linda Rosland

RECEIVED

CORR. CONTROL

42047

90DEC 5 P1:34

81.9

Crystal Latta P.O. Box 1104 Haleiwa, HI 96712

William Reilly, Administrator Environmental Protection Agency 401 M Street SW Washington, D.C. 20460

Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,

Crystal Latta

RECEIVED

EPA

CORR. CONTROL

42050

90DEC 5 P1: 33

02.0

Pliny Porter 3759 Griffith View Dr. Los Angeles, CA 90039

William Reilly, Administrator Environmental Protection Agency 401 M Street SW Washington, D.C. 20460

Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Pliny Porter

RECEIVED

EPA

CORR. CONTROL

42/18

90DEC 6 A10: 43

Monica Hayes Anderson 67 W. 89th St. New York, NY 10024

William Reilly, Administrator Environmental Protection Agency 401 M Street SW Washington, D.C. 20460

Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,

Monica Hayes Anderson

RECEIVED

EPA

CORR. CONTROL

4/8/2

90DEC 3 P 3: 44

P.24

Jai Hari Singh Khalsa Jai Hari Kaur Khalsa 65914 White Rock Loop Bend, OR 97701

William Reilly, Administrator Environmental Protection Agency 401 M Street SW Washington, D.C. 20460

Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! We strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,

Jai Hari Singh Khalsa

Jai Hari Kaur Khalsa

RECEIVED

EPA

CORR. CONTROL

41831 90DEC 3 All: 23

92.4



MS. JILL GOLDMAN 1500 N. LA SALLE S1 CHICAGO, IL 60610

Dear Mr. Reilly:

I strongly urge you to reject Ethyl's application to use MMT. We have had many years experiencing the health problems that the lead in our gasoline has caused. To add manganese would lead to another public health catastrophe. We cannot afford to repeat old mistakes. I would like you to reject this new application and immediately suspend all currently permitted use of manganese as a gasoline additive in the U.S.

We all need your support in cleaning up our air, food and water.

Marine .

Most sincerely,

Jill Goldman

Earth Day 90 Chicago

Personnel Director

ODDEC & BI: 49
CORR. CONTROL
EPA
RECEIVED

Jan 9, 1991 Carse H Spells 3923 Prices distillery Rd. Sprnoville MD 21754

William K. Reieler EPA administrator Washington, D. C. 20460

alea Si:

I must fin my voice with als Ellen K. Silbergeld in urging the EPA to sixe the Ethyl Corporation's application to use nm T (methycyclopentachenyl manganese tucarponyl) as an additive in gasoline.

Carnestly Carol H. Apicir

EPA EPA CORR. CONTROL

St: BA SINALIE

O

1/11/91

Ron I. Wish, M.D. 112 Highmount Avenue Upper Nyack, New York 10960 914-358-4815

N.Y. License #168983

Dea the Reily,

Junge you to reject the Ethyl Corporation's

application to use MMT as an orthogonal enhancing

gasobie ordelite. The public health directe which

gasobie ordelite. The public health directe which

will ensure will likely be comparable to the widespread

will ensure will likely be comparable to the widespread

and poisoning now existy in the USA.

Amere)

Re I. Wash!

RECEIVED

CORR. CONTROL

91JAN 16 P4: 14

2£.c

December 26, 1990

Steven D. Sabowitz 509 E.77th St. #1F New York, N.Y. 10021

EPA Administrator William K. Reilly Washington, D.C. 20460

Dear administrator Reillag,

Please note my opposition to Ethyl Corporations application to use methycyclopentadienyl manganese tricarbonyl (MMT) as a gasoline additive.

Sincerely, Steven D. Labourty

RECEIVED

EPA

CORR. CONTROL

170

91JAN 4 P1: 36

• • • •

Janet Luke Weaver 605 East Dufort Sagle, ID 83860

William Reilly, Administrator Environmental Protection Agency 401 M Street SW Washington, D.C. 20460

Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,

Janet Luke Weaver

TECEIVED
CORR. CONTROL
THE STATE OF THE STAT

P.36

647 Royal Abbey Drive Stone Mountain, GA 30088 January 4, 1991 P.37

Mr. William K. Reilly EPA Administrator EPA Washington, D.C. 20460

Dear Mr. Reilly:

I am writing to you to urge you not to allow the Ethyl Corporation to add methycyclopentadienyl manganese tricarbonyl (MMT) to gasoline. The addition of lead to gasoline was a terrible mistake and has caused terrible damage to the health of man and the environment, and we cannot afford to allow manganese to be added to also endanger our health.

There is not enough data on manganese to make a decision to allow its use in gasoline. No one thought lead was harmful when it was introduced to gasoline, and now we are paying the price with lead poisoning.

Please, do not allow the use of MMT in gasoline. The supposed benefits are minimal and do not warrant the use of something that will most likely prove to be extremely toxic. We have already destroyed our health and our environment enough, and I sincerely urge you to say "NO" to this attempt by the Ethyl Corporation to harm the public with MMT.

Sincerely,

Carol W. Fogle
Carol W. Fogle

PECEIVED SIJANIO AID: 35

January 3, 1991

William K Reilly EPA Administrator Washington, DC 20460

Dear Mr. Reilly,

I am writing to express my concern about the application that the Ethyl Corporation currently has into the EPA requesting the use of manganese tricarbonyl(MMT) as a gasoline additive.

Let's not allow the lack of data available about the toxic effects of MMT to become the argument to use the additive. We cannot risk leaving another epidemic like gasoline induced lead poisoning for future generations.

I would like to urge the EPA to reject this new application and immediately suspend all currently permitted use of MMT as a gasoline additive in the United States.

Respectfully,

Sue May

Rt 2 Box 195A

Maiden, NC 28650

CORR. CONTROL

USI

SIJANIA AIO: II

0Þ.c

What did you do Foso And this Mr. Keilly o Ra-Office of the Executive Director Environmental Defense Fund 257 Park Avenue South

New York, NY 10010

Ms. Jean M. Benson Box and Old New 188

RINDGE NH 03461-0302

2802 Bey 2478

October 16, 1990,

pleas to stop of whaching in action or inaction Dear Ms. Benson: Swampel I've had just about enough of the Ethyl Corporation. And once I tell you about the scheme that they're trying to put over

The Ethyl Corporation of America is asking the EPA to approve a gasoline additive it calls "HiTec 3000."

- Ethyl Corp. has launched a full-blown ad campaign that misrepresents this new additive as both safe and environmentally beneficial.
- In reality, "HiTec 3000" contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses.
- Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

In other words, the Ethyl Corporation wants permission to use the entire U.S. population as test subjects in a very profitable experiment on chronic exposure to a toxic heavy metal.

And it won't be the first time!

on the U.S. population, I think you'll agree.

Since 1925, Ethyl Corporation has championed the use of leaded gas; and has been the chief supplier of lead gasoline additives now known to have been a major contributing cause of chronic lead poisoning affecting millions of children around the world.

New research reveals a virtual lead poisoning epidemic among our nation's children, both urban and rural, rich and poor. Much of that lead -- ingested from dust and dirt in yards and playgrounds -- came out of the tailpipes of cars that burned leaded gas over the past 65 years. Cleaning up this contamination will be both slow and expensive.

Now, for the sake of its own profit, Ethyl Corporation is again ready to put our environment and public health at serious risk.

Luckily, you and I have until November 6th to stop them.

(over, please)

RECEIVED

EPA

CORR. CONTROL

1309

91JAN 23 P1: 49

-

Ethyl has until November 6th to convince EPA to approve HiTec 3000. And it has been running full page ads in major newspapers in a shameless effort to lure the public and the Administration into believing that its new additive is safe.

This is one of those rare chances we have to nip an environmental disaster in the bud. Here are the 3 steps I ask you to take immediately:

- Add <u>your</u> name to our "Open Letter to the EPA" to appear in a major newspaper advertisement from EDF (see the enclosed draft) to help us tell the real story on Ethyl Corporation to newspaper readers.
- 2. <u>Double</u> the power of your protest by writing a short personal note to Administrator William K. Reilly, Environmental Protection Agency (401 M Street, SW, Washington, DC 20460).
- 3. Send your generous gift to support the newspaper ad and to help EDF continue this critical campaign.

You know that EDF can get results. Our persistent campaign against leaded gasoline helped win its large scale phasedown during the 1970's. But this was a battle we might never have had to fight, had Ethyl Corporation acted responsibly from the start.

You see, the hazardous potential of the original lead gasoline additive was never a secret to Ethyl. Back in 1925, 40 workers at Ethyl's first plant were stricken with lead poisoning and five of them died from it. But Ethyl Corp. ignored the obvious warning sign -- that these cases of acute poisoning foreshadowed a possibly tremendous chronic problem . . . once millions of tons of lead-laden car exhaust were pumped ino the environment.

We simply can't let Ethyl Corp. put another toxic heavy metal additive in gasoline! There's no reason to open our environment to a new health hazard. We can't tolerate future unknown clean-up costs when this problem is altogether preventable today. And with your help, and the 3-step plan I've sketched above, we won't have to!

Ethyl Corporation managed to fool the public once . . . and the resulting damage to the environment and public health, much of it irreparable, is done. All we can say now is "Shame on them."

But if we let them do it again, shame on us!

Yours truly,

Fred Krupp
Executive Director

P.S. Please sign and return immediately the Authorization to add your name to our Open Letter. I must receive it no later than October 29th to meet our newspaper deadline. And thanks in advance for your help!

Dear Administrator Reilly,

As an environmentalist and an active member of the Environmental Defense Fund, I strongly urge you to deny Ethyl Corporation's application for "HiTec 3000," a Toxic manganese-based gasoline additive. This toxin is known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, long-term effects on human health are unknown.

In otherwords, the Ethyl Corporation wants permission to use the entire U.S. population as test subjects in a very profitable experiment on chronic exposure to a toxic heavy metal. won't be the first time either!

Since 1925, Ethyl Corporation has championed the use of and has been the chief supplier of lead gasoline additives now known to have been a MAJOR CONTRIBUTING CAUSE OF CHRONIC LEAD POISONING AFFECTING MILLIONS OF CHILDREN AROUND THE WORLD.

For the sake of its own profit, Ethyl Corporation is ready to put our environment and public health at serious risk.

We simply can't let Ethyl Corporation put another toxic heavy metal.additive in gasoline! There's no reason to open our environment to a new health hazard. We can't tolerate future unknown clean-up costs when this problem is altogether PREVENTABLE TODAY. And with your help we won't have to. Think Earth First!

Sincerely a concerned voter,

Name:

Susan Salo 12200 Brittainy Daks Trail Warren, Ohio 44484 Address:

\_\_\_\_

OFFER 4 PI: 05
CORR. CONTROL
CORR. CONTROL
THE CHAPED

Dear Administrator Reilly,

As an environmentalist and an active member of the Environmental Defense Fund, I strongly urge you to deny Ethyl Corporation's application for "HiTec 3000," a Toxic manganese-based gasoline additive. This toxin is known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

In otherwords, the Ethyl Corporation wants permission to use the entire U.S. population as test subjects in a very profitable experiment on chronic exposure to a toxic heavy metal. And it won't be the first time either!

Since 1925, Ethyl Corporation has championed the use of leaded gas, and has been the chief supplier of lead gasoline additives now known to have been a MAJOR CONTRIBUTING CAUSE OF CHRONIC LEAD POISONING AFFECTING MILLIONS OF CHILDREN AROUND THE WORLD.

For the sake of its own profit, Ethyl Corporation is again ready to put our environment and public health at serious risk.

We simply can't let Ethyl Corporation put another toxic heavy metal additive in gasoline! There's no reason to open our environment to a new health hazard. We can't tolerate future unknown clean-up costs when this problem is altogether PREVENTABLE TODAY. And with your help we won't have to. Think Earth First!

Sincerely a concerned voter,

Spir Caramali

Name:

Address:

Dear Administrator Reilly,

As an environmentalist and an active member of the Environmental Defense Fund, I strongly urge you to deny Ethyl Corporation's application for "HiTec 3000," a Toxic manganese-based gasoline This toxin is known to produce symptoms of Parkinson's additive. disease at high doses. Adding "HiTec 3000" to gasoline release into the environment large amounts of manganese, long-term effects on human health are unknown.

In otherwords, the Ethyl Corporation wants permission to use the population as test subjects in a very profitable experiment on chronic exposure to a toxic heavy metal. won't be the first time either!

Since 1925, Ethyl Corporation has championed the use of and has been the chief supplier of lead gasoline additives now known to have been a MAJOR CONTRIBUTING CAUSE OF CHRONIC LEAD POISONING AFFECTING MILLIONS OF CHILDREN AROUND THE WORLD.

For the sake of its own profit, Ethyl Corporation ready to put our environment and public health at serious risk.

We simply can't let Ethyl Corporation put another toxic metal additive in gasoline! There's no reason to open our ronment to a new health hazard. We can't tolerate future unknown clean-up costs when this problem is altogether PREVENTABLE TODAY. And with your help we won't have to. Think Earth First!

Sincerely a concerned voter,

Address:

aretorgensløft 1944ah ave Warren, OH44485

Dear Administrator Reilly,

As an environmentalist and an active member of the Environmental Defense Fund, I strongly urge you to deny Ethyl Corporation's application for "HiTec 3000," a Toxic manganese-based gasoline additive. This toxin is known to produce symptoms of Parkinson's Adding "HiTec 3000" to gasoline disease at high doses. release into the environment large amounts of manganese, long-term effects on human health are unknown.

In otherwords, the Ethyl Corporation wants permission to use the entire U.S. population as test subjects in a very on chronic exposure to a toxic heavy metal. experiment won't be the first time either!

Since 1925, Ethyl Corporation has championed the use of and has been the chief supplier of lead gasoline additives now known to have been a MAJOR CONTRIBUTING CAUSE OF CHRONIC LEAD POISONING AFFECTING MILLIONS OF CHILDREN AROUND THE WORLD.

For the sake of its own profit, Ethyl Corporation is ready to put our environment and public health at serious risk.

We simply can't let Ethyl Corporation put another toxic heavy metal additive in gasoline! There's no reason to open our ronment to a new health hazard. We can't tolerate future unknown clean-up costs when this problem is altogether PREVENTABLE TODAY. And with your help we won't have to. Think Earth First!

Sincerely a concerned voter,

Name: Molly S. Hartman Address: 1081 Rosacie ASE

LAKEWOOD, OH 44107.

Dear Administrator Reilly,

As an environmentalist and an active member of the Environmental Defense Fund, I strongly urge you to deny Ethyl Corporation's application for "HiTec 3000," a Toxic manganese-based gasoline additive. This toxin is known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, long-term effects on human health are unknown.

In otherwords, the Ethyl Corporation wants permission to use the population as test subjects in a very profitable experiment on chronic exposure to a toxic heavy metal. won't be the first time either!

Since 1925, Ethyl Corporation has championed the use of and has been the chief supplier of lead gasoline additives now known to have been a MAJOR CONTRIBUTING CAUSE OF CHRONIC LEAD POISONING AFFECTING MILLIONS OF CHILDREN AROUND THE WORLD.

For the sake of its own profit, Ethyl Corporation is ready to put our environment and public health at serious risk.

We simply can't let Ethyl Corporation put another toxic metal additive in gasoline! There's no reason to open our ronment to a new health hazard. We can't tolerate future unknown clean-up costs when this problem is altogether PREVENTABLE TODAY. And with your help we won't have to. Think Earth First!

Sincerely a concerned voter,

Name: Lell Ount

Address: 194 YCK Ave. NW. WARKEN OH,

44485

Dear Administrator Reilly,

As an environmentalist and an active member of the Environmental Defense Fund, I strongly urge you to deny Ethyl Corporation's application for "HiTec 3000," a Toxic manganese-based gasoline This toxin is known to produce symptoms of Parkinson's additive. disease at high doses. Adding "HiTec 3000" to gasoline release into the environment large amounts of manganese, long-term effects on human health are unknown.

In otherwords, the Ethyl Corporation wants permission to use the entire U.S. population as test subjects in a very profitable experiment on chronic exposure to a toxic heavy metal. won't be the first time either!

Since 1925, Ethyl Corporation has championed the use of and has been the chief supplier of lead gasoline additives now known to have been a MAJOR CONTRIBUTING CAUSE OF CHRONIC LEAD POISONING AFFECTING MILLIONS OF CHILDREN AROUND THE WORLD.

For the sake of its own profit, Ethyl Corporation is ready to put our environment and public health at serious risk.

We simply can't let Ethyl Corporation put another toxic metal additive in gasoline! There's no reason to open our ronment to a new health hazard. We can't tolerate future unknown clean-up costs when this problem is altogether PREVENTABLE TODAY. And with your help we won't have to. Think Earth First!

Sincerely a concerned voter,

Joseph D. Bieleck: 1660 Sodon-Huttings rd.
Vienna, Ohio
44473

Address:

Dear Administrator Reilly,

As an environmentalist and an active member of the Environmental Defense Fund, I strongly urge you to deny Ethyl Corporation's application for "HiTec 3000," a Toxic manganese-based gasoline This toxin is known to produce symptoms of Parkinson's additive. disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese. long-term effects on human health are unknown.

In otherwords, the Ethyl Corporation wants permission to use the population as test subjects in a very profitable experiment on chronic exposure to a toxic heavy metal. won't be the first time either!

Since 1925, Ethyl Corporation has championed the use of and has been the chief supplier of lead gasoline additives now known to have been a MAJOR CONTRIBUTING CAUSE OF CHRONIC LEAD POISONING AFFECTING MILLIONS OF CHILDREN AROUND THE WORLD.

For the sake of its own profit, Ethyl Corporation is ready to put our environment and public health at serious risk.

We simply can't let Ethyl Corporation put another toxic heavy metal additive in gasoline! There's no reason to open our ronment to a new health hazard. We can't tolerate future unknown clean-up costs when this problem is altogether PREVENTABLE TODAY. And with your help we won't have to. Think Earth First!

Sincerely a concerned voter,

Name: Jen Baitlor
Address: 1555 Edgewood
Warren Dhia 44483

Dear Administrator Reilly,

As an environmentalist and an active member of the Environmental Defense Fund, I strongly urge you to deny Ethyl Corporation's application for "HiTec 3000," a Toxic manganese-based gasoline additive. This toxin is known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

In otherwords, the Ethyl Corporation wants permission to use the entire U.S. population as test subjects in a very profitable experiment on chronic exposure to a toxic heavy metal. And it won't be the first time either!

Since 1925, Ethyl Corporation has championed the use of leaded gas, and has been the chief supplier of lead gasoline additives now known to have been a MAJOR CONTRIBUTING CAUSE OF CHRONIC LEAD POISONING AFFECTING MILLIONS OF CHILDREN AROUND THE WORLD.

For the sake of its own profit, Ethyl Corporation is again ready to put our environment and public health at serious risk.

We simply can't let Ethyl Corporation put another toxic heavy metal additive in gasoline! There's no reason to open our environment to a new health hazard. We can't tolerate future unknown clean-up costs when this problem is altogether PREVENTABLE TODAY. And with your help we won't have to. Think Earth First!

Sincerely a concerned voter,

Name: Rendld D. Gilbert

Address: 4/60 N. PARK EXT. Corthand, 0400 44410

Dear Administrator Reilly,

As an environmentalist and an active member of the tal Defense Fund, I strongly urge you to deny Ethyl Corporation's application for "HiTec 3000," a Toxic manganese-based gasoline additive. This toxin is known to produce symptoms of Parkinson's Adding "HiTec 3000" to gasoline disease at high doses. release into the environment large amounts of manganese, long-term effects on human health are unknown.

In otherwords, the Ethyl Corporation wants permission to use the population as test subjects in a very profitable experiment on chronic exposure to a toxic heavy metal. won't be the first time either!

Since 1925, Ethyl Corporation has championed the use of and has been the chief supplier of lead gasoline additives now known to have been a MAJOR CONTRIBUTING CAUSE OF CHRONIC LEAD POISONING AFFECTING MILLIONS OF CHILDREN AROUND THE WORLD.

For the sake of its own profit, Ethyl Corporation is ready to put our environment and public health at serious risk.

We simply can't let Ethyl Corporation put another toxic metal additive in gasoline! There's no reason to open our ronment to a new health hazard. We can't tolerate future unknown clean-up costs when this problem is altogether PREVENTABLE TODAY. And with your help we won't have to. Think Earth First!

Sincerely a concerned voter, Down Marel West

Address: 4160 N, Park Ext Cortland O H 444/1

Dear Administrator Reilly,

As an environmentalist and an active member of the Environmental Defense Fund, I strongly urge you to deny Ethyl Corporation's application for "HiTec 3000," a Toxic manganese-based gasoline additive. This toxin is known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, long-term effects on human health are unknown.

In otherwords, the Ethyl Corporation wants permission to use the entire U.S. population as test subjects in a very profitable experiment on chronic exposure to a toxic heavy metal. won't be the first time either!

Since 1925, Ethyl Corporation has championed the use of and has been the chief supplier of lead gasoline additives now known to have been a MAJOR CONTRIBUTING CAUSE OF CHRONIC LEAD POISONING AFFECTING MILLIONS OF CHILDREN AROUND THE WORLD.

the sake of its own profit, Ethyl Corporation is again ready to put our environment and public health at serious risk.

We simply can't let Ethyl Corporation put another toxic metal additive in gasoline! There's no reason to open our ronment to a new health hazard. We can't tolerate future unknown clean-up costs when this problem is altogether PREVENTABLE TODAY. And with your help we won't have to. Think Earth First!

Sincerely a concerned voter,

Name: Velia & Baba

Address: 409 Faunourt N.E. Warren Oh.

Dear Administrator Reilly,

As an environmentalist and an active member of the Environmental Defense Fund, I strongly urge you to deny Ethyl Corporation's application for "HiTec 3000," a Toxic manganese-based gasoline additive. This toxin is known to produce symptoms of Parkinson's disease at high doses. -Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

In otherwords, the Ethyl Corporation wants permission to use the entire U.S. population as test subjects in a very profitable experiment on chronic exposure to a toxic heavy metal. And it won't be the first time either!

Since 1925, Ethyl Corporation has championed the use of leaded gas, and has been the chief supplier of lead gasoline additives now known to have been a MAJOR CONTRIBUTING CAUSE OF CHRONIC LEAD POISONING AFFECTING MILLIONS OF CHILDREN AROUND THE WORLD.

For the sake of its own profit, Ethyl Corporation is again ready to put our environment and public health at serious risk.

We simply can't let Ethyl Corporation put another toxic heavy metal additive in gasoline! There's no reason to open our environment to a new health hazard. We can't tolerate future unknown clean-up costs when this problem is altogether PREVENTABLE TODAY. And with your help we won't have to. Think Earth First!

Sincerely a concerned voter,

Name: Zerry M. Placer J.

Address: 686 BANK ST WARREN OHIO 44483

Dear Administrator Reilly,

As an environmentalist and an active member of the Environmental Defense Fund, I strongly urge you to deny Ethyl Corporation's application for "HiTec 3000," a Toxic manganese-based gasoline additive. This toxin is known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

In otherwords, the Ethyl Corporation wants permission to use the entire U.S. population as test subjects in a very profitable experiment on chronic exposure to a toxic heavy metal. And it won't be the first time either!

Since 1925, Ethyl Corporation has championed the use of leaded gas, and has been the chief supplier of lead gasoline additives now known to have been a MAJOR CONTRIBUTING CAUSE OF CHRONIC LEAD POISONING AFFECTING MILLIONS OF CHILDREN AROUND THE WORLD.

For the sake of its own profit, Ethyl Corporation is again ready to put our environment and public health at serious risk.

We simply can't let Ethyl Corporation put another toxic heavy metal additive in gasoline! There's no reason to open our environment to a new health hazard. We can't tolerate future unknown clean-up costs when this problem is altogether PREVENTABLE TODAY. And with your help we won't have to. Think Earth First!

Sincerely a concerned voter,

Name: Juliane L. Broz

Address: 586 BANK St N.C. Warren OH 44483

Dear Administrator Reilly,

As an environmentalist and an active member of the Environmental Defense Fund, I strongly urge you to deny Ethyl Corporation's application for "HiTec 3000," a Toxic manganese-based gasoline additive. This toxin is known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline release into the environment large amounts of manganese, long-term effects on human health are unknown.

In otherwords, the Ethyl Corporation wants permission to use the population as test subjects in a very profitable entire U.S. experiment on chronic exposure to a toxic heavy metal. won't be the first time either!

Since 1925, Ethyl Corporation has championed the use of and has been the chief supplier of lead gasoline additives now known to have been a MAJOR CONTRIBUTING CAUSE OF CHRONIC LEAD POISONING AFFECTING MILLIONS OF CHILDREN AROUND THE WORLD.

For the sake of its own profit, Ethyl Corporation is ready to put our environment and public health at serious risk.

We simply can't let Ethyl Corporation put another toxic heavy metal additive in gasoline! There's no reason to open our ronment to a new health hazard. We can't tolerate future unknown clean-up costs when this problem is altogether PREVENTABLE TODAY. And with your help we won't have to. Think Earth First!

Sincerely a concerned voter,

Name: Rick Beckham

Address: 2374 alaborne - 5.W.

Dalton, Ohio 44618

Dear Administrator Reilly,

As an environmentalist and an active member of the Environmental Defense Fund, I strongly urge you to deny Ethyl Corporation's application for "HiTec 3000," a Toxic manganese-based gasoline This toxin is known to produce symptoms of Parkinson's additive. Adding "HiTec 3000" to gasoline disease at high doses. release into the environment large amounts of manganese, long-term effects on human health are unknown.

In otherwords, the Ethyl Corporation wants permission to use the entire U.S. population as test subjects in a very profitable experiment on chronic exposure to a toxic heavy metal. won't be the first time either!

Since 1925, Ethyl Corporation has championed the use of and has been the chief supplier of lead gasoline additives now known to have been a MAJOR CONTRIBUTING CAUSE OF CHRONIC LEAD POISONING AFFECTING MILLIONS OF CHILDREN AROUND THE WORLD.

the sake of its own profit, Ethyl Corporation is ready to put our environment and public health at serious risk.

We simply can't let Ethyl Corporation put another toxic heavy metal additive in gasoline! There's no reason to open our ronment to a new health hazard. We can't tolerate future unknown clean-up costs when this problem is altogether PREVENTABLE TODAY. And with your help we won't have to. Think Earth First!

Sincerely a concerned voter,

Name:

Cooley D. Hohl
Address:
821 Amherst Rd. N.E. Massillan, Ohio 44646

## Dear Mr. Reilly:

I recently learned of the Ethyl Corporations application to produce and sell its newest gasoline additive, MMT. Thanks in part to Ethyl our environment has been saturated with huge doses of tetraethyl lead for almost threequarters of a century. And now the EPA is considering allowing a gasoline additive with manganese (a neurotoxin) to be put on the market. Ethyl Claims that he manganese releases into the environment will be insignificant. But we all know that with so many willows of cars in the U.S., even an exhaust product expelled in trace amounts will eventually accomulate to hazardous concentrations. I unge you to reject Ethyl's application to use MMT and send a message to the industrial Corporations attent put more value on the dollar bill than the natural environment we all share.

> Sincerely, Jay Junga

COPR. CONTROL COPR. CONTROL AUS SUFEB 8 AII: 52 January 11, 1991

Dear Mr. Reilly,

The following members of the Oconee Environmental Coalition, would like for you, reject the Ethyl Corporation's request for the approval of the widespread use of methycyclopentadienyl manganese tricarbonyl (MMT) as a gasoline additive. Since there is no data on the potential cumulative health effects of massive inputs of manganese into the environment, we think that it would be a mistake to grant permission for its use as an additive. Our society cannot afford to repeat the public health catastrophe associated with the use of lead in gasoline. According to Merritt's Textbook of Neurology, "prolonged exposure to manganese ....leads to behavioral changes and later, to parkinsonism."

We urge you to say no to their request and immediately suspend all currently permitted use of manganese as a gasoline

additive in the United States.

Cardree Mikeauery
Mary and Pullips

Sich Wieters

Victor Wieters

Victor Wieters

Thank you,

Skery Whensy

Plula Sundan

Dabbie Shamps

For othy But lev

Mary and Mary

CORR. CONTROL

CORR. CONTROL

CORR. CONTROL

STEER 8 8 3 3 1 15 5

Siri Pritam Kaur Khalsa 1215 El Margarita Rd. Yuba City, CA 95991

William Reilly, Administrator Environmental Protection Agency 401 M Street SW Washington, D.C. 20460

Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,

Siri Pritam Kaur Khalsa

SPR Khalsa

CORR. CONTROL
3573
91FEB 26 All: 01

•

₽9°c

### ENVIRONMENTAL DEFENSE FUND

257 Park Avenue South New York, NY 10010 (212) 505-2100

Fred Krupp
Executive Director

January 20, 1991

Mr. John Van N. Dorr II 4982 Sentinel Drive #304 Sumner Village Bethesda, Maryland 20016

Dear Mr. Dorr:

Thank you for your recent letter. I appreciate your taking time to write to express your concern about EDF's protest of the addition to manganese in gasoline.

As you point out, the problems arising from lead in gasoline were greatly exacerbated by growth in traffic. However, those high-density traffic patterns are likely to continue for at least the medium term. Thus, widespread addition of manganese to gasoline are likely to produce — as with lead — cumulative environmental loadings of a persistent, non-degradable heavy metal. Indeed, the clearest message to be learned from lead-gas additives is that using such materials in an inherently dispersive fashion creates a problem that is nearly impossible to correct, at least absent vast expenditures of money.

The point of Dr. Silbergeld's essay is precisely that the low-dose, long-term effects of manganese are not well understood, and that running an uncontrolled experiment on the general U.S. population is neither a morally acceptable nor scientifically sound way to gather such data. Although you indicate that you have not observed health problems in manganese workers, health effects of high-dose manganese exposure are in fact extensively documented in the toxicological literature. In addition, these views on manganese's high- dose toxicity and lack of knowledge on its low-dose effects are echoed by the detailed comments on Ethyl's application submitted by the National Institute of Environmental Health Sciences.

We strongly believe that our position on manganese additives is not only scientifically supported, but indeed the only responsible position in light of (i) manganese's known high-dose toxicity, (ii) the lack of knowledge of its low-dose effects, and (iii) prior experience on heavy-metal additives in gasoline.

1616 P Street, NW Washington, DC 20036 (202) 387-3500

1405 Arapahoe Avenue Boulder, CO 80302 (303) 440-4901

5655 College Avenue Oakland, CA 94618 (415) 658-8008

1108 East Main Street Richmond, VA 23219 (804) 780-1297

128 East Hargett Street Raleigh, NC 27601 (919) 821-7793

1800 Guadalupe Austin, TX 78701 (512) 478-5161 I understand, and share, your opinion that the environment can benefit from cooperation with business and industry. It is, in fact, an important part of EDF's strategy for problem-solving. One case in point is EDF's joint task force with the McDonald's Corporation. (See enclosed article). Please take time to read the enclosed book, Ahead of the Curve which details EDF's use of market incentives and cooperative efforts.

Yours truly,

Vied Box

FDK/dkw

CC: Bill Reclay EPA

Jay Hair, National Wildlife Federation
Sue Merrow, Sierra Club
John Sawhill, The Nature Conservancy
Peter Berle, National Audubon Society
John Adams, NRDC
George Frampton, Wilderness Society
Anthony White, Audobon Naturalist Society
Peter Bahouth, Greenpeace USA

JOHN VAN N. DORR II
4982 SENTINEL DRIVE, APT. 304
SUMNER VILLAGE
BETHESDA, MARYLAND 20616
December 14, 1990

Mr. Fred Krupp, Executive Director Environmental Defense Fund 257 Park Avenue South New York City, New York 10010

Dear Mr. Krupp:

I have received the Environmental Defense Fund Letter of October 1990, Vol XXII, #4, which, on page 7, contains a diatrabe by Ms. Silbergeld against the Ethyl Corporation and its advocacy of a managanese additive to increase the efficiency of gasoline motor fuel. No credible or even incredible scientific or statistical evidence was advanced -- the article as published is based on the fact that the Ethyl Corp. introduced lead as an additive to gasoline many years ago and that lead poisoned the atmosphere until its removal by EPA some years ago. Ergo - the manganese addition must be bad too!

At the time lead was added to gasoline, I was not (nor do I think many other persons were) aware of the dangers of atmospheric lead. Indeed, considering the low numbers of cars in those days, the danger probably was not great. Only the proliferation of people, cars, and urban crowding exacerbated the danger. Now we are removing old paint from buildings, old plumbing, old water fountains because we are aware of dangers, but I see no articles excoriating paint or plumbing companies.

Of course manganese in high concentrations is toxic. So are most other elements. So is salt. However, we know (if nutrition experts are to be trusted) that we need certain quantities of the so-called "toxic" elements to support our life systems, as do other animals and plants. That is why certain of these elements are routinely added to fertilizers.

In 35 years of close contact with manganese as a specialist on manganese for the U.S. Geological Survey, having visited hundreds of manganese deposits and mines extracting manganese minerals of widely varying composition on five continents, I have never encountered health problems attributed to manganese in workers in the industry. This does not mean that manganese in certain forms cannot be toxic; rather it means that allegations as to toxicity need to be backed up by carefully documented facts.

It is very important for environmental organiza-

tions to avoid ill-informed and exaggerated attacks on industries. Many industries are advancing the state of the science and art of avoiding damage to the environment. Some are not. Environmental organizations should encourage and assist those companies that are making honest effort and chastize those which are not. Many commodities needed by our complex civilization cannot be produced without some danger to the environment. Should . we return to caves? Could we?

Environmentalists characteristically underestimate the force of the mating instinct and the adaptability of animals to changing environments. Last August I had the pleasure of seeing hundreds of sea otters, seals, sea lions, eagles, various sea birds, on Prince William Sound. One would never learn of this recovery from the many environmental organizations to which I contribute. In the Prudhoe Bay oil fields I saw the complete compatibility of local wildlife and intelligent industrial development, but all I get from the environmental organizations to which I belong are outraged cries about possible development of ANWAR.

Environmental organizations should ask themselves whether the often shrill and misleading attacks on industries that are doing their best to provide needed commodities with minimal environmental cost are not responsible for our defeats last election day. The public is getting fed up and cynical, as well it might. Our past victories and the ones we still have to win. such as the elimination or at least strict control of clear-cutting, must be based on the education of the public in a responsible manner. The public is not stupid. We must supply objective, accurate information if we hope to receive continued support from the public.

Shor Van h Dorr II

CC: Mr. William Reilly, EPA Administrator

Mr. Jay Hair, President, National Wildlife Federation

Ms. Sue Merrow, President, Sierra Club

Mr. John Sawhill. President, Nature Conservancy

Mr. Peter A. Berle, President, National Audubon Society

Mr. Robert Heist, President, Natural Resources Defense Council

Mr. George Frampton. President. Wilderness Society

Mr. Anthony White, President, Audubon Naturalist Society

Mr. Peter Bahouth, President, Greenpeace

MR, FRANCIS W. MILLER 2496 CENTRAL AVENUE BALDWIN, N.Y., 11510-3606 FEBRUARY 28, 1991 WILLIAM K. REILLY ENVIRONMENTAL PROTECTION AGENCY 401 M STREET S.W. WASHING-TON, D.C., 20460 Dear Sir! I am in recipt of a letter from Ethyl Corporation 330 South 4th Stral BOX 3189 Richmond, Virginia 23217 Their extensive tests of their Hi Tec \$3000 fuel additive show tail pipe emissions including mitrogen skides can be reduced significantly. Refiners could reduce reliance on toxic arouties used to boost octanizatings. many borrels of crude oil saved daily Cost to container reduced if anything Canada has been using since 1978 Please cutall the bureacratic red tape and IMPLEMENT the use of the real environmental help immediately. This is not some of the guess worth and larming of land working people at endless expense that has been done! Thankyou Hanus Mille P.S. ann Landers Radan interesting but. about the more certly use of millions of lone of disposable diapers, VS, old fashioned, which take 500 years to decompose while filling up land fills

SI:E9 & AAMIE CORR. CONTROL

## A New Idea from the Folks Who Gave Us Leaded Gas

By EDF toxicologist Dr. Ellen K. Silbergeld, who was the only environmentalist to appear before the Environmental Protection Agency (EPA) to urge rejection of an application to use a manganese-based compound as a gasoline additive.

n 1925, the Ethyl Corporation introduced its new gasoline additive, tetraethyl lead, as "a gift of God." It took us over 50 years to realize how diabolical this "gift" proved to be. The hard-won

ELLEN K. SILBERGELD

removal of most lead from gasoline represents one of EPA's most significant public health achievements. I am proud to have participated with EDF in that victory.

Now, in 1990, Ethyl comes bearing

yet another gift, methycyclopentadienyl manganese tricarbonyl (MMT), and asks EPA to approve it as an octane-enhancing gasoline additive. To this offering, EPA must just say "No."

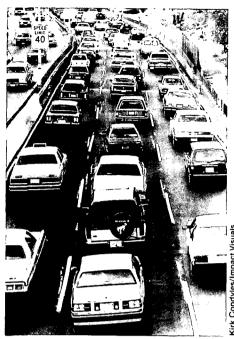
Lead poisoning is an epidemic in the U.S. Even after considerable reductions

Amazingly, in light of the history of leaded gasoline, Ethyl finds it unnecessary to do anything more in 1990 than it did in 1925.

have been imposed on the use of lead in gasoline—only after prolonged debate and litigation, it should be noted—we are just now confronting the extraordinarily difficult challenge of cleaning up the residues of lead fallout from playgrounds, roadsides, and backyards in America.

The parallels between Ethyl's 1990 proposal to use manganese and its 1925 lead proposal are chilling. The exclusive justification for each additive is its purported effect on emissions of hydrocarbons and nitrous oxides from cars. No data were or are given on the potential cumulative health effects of massive inputs of a toxic metal into the environment, its deposition on surface dusts and soils, or its long-term fate and pathways of exposure to humans.

In 1925, Ethyl argued that the amounts of lead to be added to gasoline were negligible and that lead was only toxic at the high doses encountered in certain industrial settings. In 1990, it argues that



With ever-increasing numbers of cars on the road, manganese added to gasoline would—like lead—accumulate in the environment with potentially tragic results, particularly in urban areas.

the manganese releases to the environment will be insignificant and that manganese is only toxic at high doses in industrial settings.

In both cases, the critical national importance of accepting Ethyl's additive is argued. In a well-funded ad campaign claiming that MMT can reduce tailpipe emissions, Ethyl is seeking to exploit public concern over pollutants in global and local air. The purported reductions, if any, are very small and are overwhelmed by the health costs of exposure to manganese.

Amazingly, in light of the history of leaded gasoline, Ethyl finds it unnecessary to do anything more in 1990 than it did in 1925. Ignoring contrary evidence, it selectively cites bits of data to support its contention that the use of MMT will not increase airborne manganese concentrations over cities, and provides no data on the impacts of manganese additives on manganese levels in other parts of the environment. It presents no in-depth review of the health effects of manganese, nor-more important-any discussion of critical gaps in the data about manganese toxicity that must be filled before a decision that could release many thousands of tons of manganese to the environment can be approved.

The data on manganese are relatively sparse compared to lead—we have not yet conducted a massive human experi-

ment with manganese. But both what we know and what we do not know about the likely toxic effects of adding large amounts of manganese to the environment must persuade EPA to reject this application.

We know that manganese at high dose is a demonstrated human neurotoxin, with persistent and irreversible pathological effects on brain structure and resulting severe impairments in movement and mental state. We have indications that manganese may also selectively affect the fetus, the young, and the aged.

We do *not* know what the long-term chronic, low-dose effects of human exposure to manganese are. We do *not* know what a "safe" level of manganese exposure is, particularly for the young or the aged who may be at increased risk. We do *not* know if manganese is carcinogenic, although there is evidence that it can break DNA, which may indicate cancercausing potential.

But from our tragic experience with lead, we know a great deal about the likely cumulative effects of such a use upon human exposure. We know that the gradual contamination of the environment by manganese will not be readily reversed. We know that manganese will

Society cannot afford to repeat the public health catastrophe associated with the use of lead in gasoline.

accumulate in many places—particularly in urban dusts and soils—that are subject to intensive human interaction and that will be sources of direct human exposure to manganese.

We rarely have an opportunity to apply the clear lessons of 50 years of very similar experience. To disregard these lessons by approving the widespread and inevitably dispersive use of manganese would be to invite repetition of the public health catastrophe associated with the use of lead as a gasoline additive since 1925. Society cannot afford such a repetition. EDF is urging EPA to reject this new application and immediately suspend all currently permitted use of manganese as a gasoline additive in the United States.

EDF MEMBER ACTION ALERT Concerned members can help by writing to EPA Administrator William K. Reilly (Washington, DC 20460) urging him to reject Ethyl's application to use MMT.

Sincerely, Usan Jay

# **EDF and Cancer Researchers Join to Save the Pacific Yew**

Prominent cancer researchers and ten environmental groups joined EDF in petitioning Interior Secretary Manuel Lujan to list the Pacific yew (Taxus brevifolia) as a threatened species under the Endangered Species Act. Simultaneously, the American Cancer Society urged Lujan to "take any and all actions to protect the Pacific yew as a 'threatened species."

The bark of the tree, a slow-growing species found mainly in the ancient forests of the Pacific Northwest, is the only known source of taxol, one of the most promising new drugs for treating various cancers, including advanced ovarian cancer. A shortage of natural taxol is constraining medical research, and all attempts to synthesize the drug have failed.

"It is incredible that the Pacific yew receives virtually no protection on either private or public lands, in view of its rarity and importance to cancer research and treatment," said EDF attorney-scientist Bruce S. Manheim, who drafted the petition to Lujan.

The Pacific yew was once found widely in forests from Alaska to central California, but it has been seriously depleted by heavy logging. According to one estimate, only 5% of original Pacific yew habitat in ancient forests remains.

The thin bark of the yew makes it particularly vulnerable to clearcut logging and burning. Moreover, the yew does not grow fast enough to reestablish itself in tree plantations during the typical 50-to-80 year rotation.

Taxol's extraordinary effectiveness as an anti-cancer compound was shown in a recent trial in which it produced a positive response in 30% of ovarian cancer patients who had not responded to previous treatment. Preliminary results from other



Attorney-scientist Bruce S. Manheim has worked with 30 states to develop programs to protect endangered wild plant species.

studies suggest that taxol may also help in treating breast cancer, non-small cell lung cancer, head, neck, and stomach cancers, and malignant melanoma.

Listing the Pacific yew as a threatened species would authorize the Federal Government to protect the species from habitat destruction and commercial exploitation. It would permit a controlled sustainable harvest for medical research while prohibiting unauthorized collection of the tree for other purposes.

"The yew is a tangible example of the need to protect forests and the myriad living resources within them," said Manheim. "If we do not, we will have squandered a rich storehouse of natural products that, like taxol, may have enormous medical value."

## Task Force to Study Fast-Food Trash

Continued from page 1.

it has the clout and the ability to make this an important study by transforming the recommendations into an impressive set of actions. The joint study could have broad implications for all producers and users of plastic and paper packaging, in both food and non-food industries," Denison said.

Krupp emphasized the unique nature of the task force. "We hope this process will demonstrate how business and environmental groups with very different perspectives can nevertheless work together to improve the environment," he said. "At the same time, our agreement provides for each organization to preserve its independence and integrity." He emphasized that EDF will continue to pursue strong legislation and litigation on solid waste issues.

### **Press Reaction to Joint Announcement**

"Big Mac Joins With Big Critic To Cut Trash"

-The Wall Street Journal

"...may break ground in the fight to protect the environment."

-The Boston Globe

NON-PROFIT ORG.

U.S. POSTAGE

"The concept of peaceful negotiation of differences may not find many takers in the Middle East. But it's gained new life here at home between a major environmental group that usually sues waste-producers and one of its most likely targets, the giant McDonald's fast-food chain."

The Tribune, Oakland, California

"One welcome side effect of the plan is McDonald's decision not to build incinerators at its restaurants to burn wastes."

-Star Tribune, Minneapolis-St. Paul

#### **ENVIRONMENTAL DEFENSE FUND**

Since 1967 — The Power of Positive Solutions 257 Park Avenue South, New York, NY 10010

Forwarding and Return Postage Guaranteed Address Correction Requested

Watch for "EARTH TO KIDS:
A Guide to Products for a
Healthy Planet," this
December on HBO. Produced
by Consumer Reports Television
in association with EDF.

PAID
ENVIRONMENTAL
DEFENSE FUND

PEEL OFF FOR ORDER FORM INSIDI 04821533 ALEXANDRA GAYEK 114 SEARS ST ITHACA NY 14850



8590 Renown Drive San Diego, CA 92119

March 19, 1991

Mr. William K. Reilly EPA Administrator Washington, DC 20460

Dear Mr. Reilly:

I have just read an article in a newsletter put out by Fanlight Productions about the new manganese-based gasoline additive, which is being promoted for use by the Ethyl Corporation. It states that high doses of manganese are known to cause persistent and irreversible brain damage and may more severely affect fetuses, the young and the aged. The warning from toxicologist Ellen K. Silbergeld of the Environmental Defense Fund states that we know little about long-term, low-dosage effects of manganese, and to allow its use without further study would amount to "a massive human experiment".

I urge you to reject Ethyl's application for authorization to introduce the new additive to gasoline. There are simply too many toxic substances in our human environment to worry about right now and we could do well to eliminate any concerns about new ones before they exist. Thanks for considering my appeal.

Sincerely yours,

Beda Johnson

Concerned citizen

RECEIVED

EPA

CORR. CONTROL

(005)

91MAR 25 P 4: 08

Nancy K. Herzberg Mills Road Cape Porpoise, ME 04014

March 15, 1991

William K. Reilly EPA Washington, D.C. 20460

Dear Mr. Reilly:

I urge you to reject Ethyl Corporation's application to use MMT as a new gasoline additive. I urge the EPA to suspend all currently permitted use of manganese as a gasoline additive in the United States. The widespread use of manganese would invite the repetition of the public health catastrophe associated with the use of lead as a gasoline additive.

Thank you for considering my views.

Sincerely,

Manay K. Hersberg 1

SECEIVED PRINCE

Match 7, 1991

Dear Administrator Reilly,

As an environmentalist and an active member of the Environmental Defense Fund, I strongly urge you to deny Ethyl Corporation's application for "HiTec 3000," a Toxic manganese-based gasoline additive. This toxin is known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, long-term effects on human health are unknown.

In otherwords, the Ethyl Corporation wants permission to use the entire U.S. population as test subjects in a very profitable experiment on chronic exposure to a toxic heavy metal. won't be the first time either!

Since 1925, Ethyl Corporation has championed the use of gas, and has been the chief supplier of lead gasoline additives now known to have been a MAJOR CONTRIBUTING CAUSE OF CHRONIC LEAD POISONING AFFECTING MILLIONS OF CHILDREN AROUND THE WORLD.

For the sake of its own profit, Ethyl Corporation is ready to put our environment and public health at serious risk.

We simply can't let Ethyl Corporation put another toxic heavy metal additive in gasoline! There's no reason to open our ronment to a new health hazard. We can't tolerate future unknown clean-up costs when this problem is altogether PREVENTABLE TODAY. And with your help we won't have to. Think Earth First!

Sincerely a concerned voter,
Name: Ronald B. Dull

Address: 205 Churchill-Hubbard Rd., Apt. 10 Youngstown, O. 44505-1362

Phone: 216-759-7111

1.,,0

RECEIVED CORR. CONTROL LAGS

1/30/91

Environmental Protection Agency William Reilly, Administrator 401 M Street, SW, Washington, D.C. 20460

Sir,

This letter is in reference to Ethyl Corporation and their product "HiTec 3000". The information that I read about the petroleum additive appeared to show the product is very effective and needs your approval. Protecting and cleaning the environment is important, any product that promotes this far out weights minimal side effects or special interest groups! I hope that the conclusions from your testing backs what I have read and will lend to your approval.

Thank you for your time.

Sincerely

4004 Cork La Porte, CO 80535 Mark and Susan Fowler

RECEIVED

CORR. CONTROL

91FEB12 A 9: 56